

AFFIDAVIT

I, Andrew W. Kremer, having been duly sworn, depose and state:

1. I am a United States Postal Inspector, having been so employed since May 19, 2012. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service (USPIS) with investigative responsibility for southwest Ohio and northern Kentucky. Part of my investigative responsibility involves the use of the United States Mail in the illegal transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.
2. Your Affiant completed United States Postal Inspection Service Basic Training in May 2012. The training involved narcotic investigation techniques, chemical field tests and training in the detection and identification of controlled substances being transported in the United States Mail. In addition to this formal training, your Affiant has worked since May 2012 with various federal, state and local law enforcement agencies in the investigation of the transportation of illegal drugs and their identification.
3. This Affidavit is made in support of search warrants for the following properties, namely packages associated with the following United States Postal Service (USPS) Priority Mail, USPS Tracking Numbers:
 - a. **9505 5126 7939 9273 2920 03**
 - b. **9505 5126 7939 9273 2919 90**

as further described in Attachment A. This Affidavit is made in support of a warrant to search the packages for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed in relation to the following offenses:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 841,

Because this Affidavit is being submitted in support of the application of the United States to search the packages, it does not include every fact known concerning this investigation, I have set forth facts and circumstances that I have relied upon to establish probable cause to justify the issuance of a warrant to search the above-described packages. The packages are currently located at the USPIS Cincinnati Field Office.

4. Your Affiant has become aware that drug traffickers frequently use Priority Mail Express and/or Priority Mail, services offered by the USPS, to transport narcotics and other dangerous controlled substances. As a result of investigations and successful controlled substance prosecutions where Priority Mail Express and/or Priority Mail were used, your Affiant has learned of certain characteristics indicative of other Priority Mail Express and/or Priority Mail items previously identified as containing narcotics or other

dangerous controlled substances. Some of these characteristics include, but are not necessarily limited to or used on every occasion - false or non-existent return address, addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity.

5. On or about October 2, 2019, your Affiant intercepted the packages at the USPS Network and Distribution Center, Cincinnati, Ohio.

The packages are further described as:

Package 1:

Priority Mail, USPS Tracking Number: 9505 5126 7939 9273 2920 03

Sender: Value+ Marketing
4201 E Cesar Chavez Ave
Los Angeles, CA 90063

Addresssee: LEIGHA SAYRE
5470 BEECHMONT AVE APT.4
CINCINNATI, OHIO 45230

Package 2:

Priority Mail, USPS Tracking Number: 9505 5126 7939 9273 2919 90

Sender: Value+ Marketing
4201 E Cesar Chavez Ave
Los Angeles, CA 90063

Addresssee: LEIGHA SAYRE
5470 BEECHMONT AVE APT.4
CINCINNATI, OHIO 45230

6. Observation and USPS tracking information of the above listed Priority Mail packages, by your Affiant indicated they were mailed from the City of Industry Post Office, City of Industry, California 91715.
7. The Consolidated Lead Evaluation and Reporting (CLEAR) database system was researched by your Affiant regarding the listed return address of packages 1 and 2,

Value+ Marketing, 4201 E Cesar Chavez Ave, Los Angeles, CA 90063. CLEAR is a public record data investigative platform available exclusively to law enforcement and other government investigators about people and businesses. The information obtained from the system indicated there is no Value+ Marketing associated with that address.

8. The CLEAR database was researched by your Affiant regarding the addressee, LEIGHA SAYRE, 5470 BEECHMONT AVE APT.4, CINCINNATI, OHIO 45230. The information obtained from the system indicated there is a Leigha Sayre associated with that address.
9. On or about October 2, 2019, your Affiant arranged for Deputy Nick Poole, Hamilton County Sheriff's Office, to utilize a narcotics canine to check the packages. Deputy Poole and his canine "Akim" are a currently certified narcotics team. The team is certified by the Ohio Peace Officer Training Commission and the Office of the Attorney General (Ohio). Deputy Poole reports that "Akim" passed all of his examinations and has successfully located hidden drugs in the past, and therefore your Affiant considers "Akim" to be reliable. On the same date, your Affiant met Deputy Poole at the USPIS Office, Cincinnati, Ohio, where the packages listed above were placed in separate rooms among several other similar packages and presented to narcotic canine, "Akim", who alerted positively to the presence or odor of a controlled substance upon the USPS packages described below:
 - a. **Priority Mail, USPS Tracking Number: 9505 5126 7939 9273 2920 03**
 - b. **Priority Mail, USPS Tracking Number: 9505 5126 7939 9273 2919 90**

Attached herewith, and incorporated by reference, is a photocopy of the narcotic canine handler's record of examination.

10. Based upon my experience and training, this information, along with the positive alert of narcotic canine "Akim" is indicative of the packages containing narcotics or proceeds relating thereto.

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11. Based upon the information contained in this Affidavit, your Affiant believes that there is probable cause to believe that the packages described below will contain evidence and/or contraband, fruits of crime, or other items illegally possessed:

- a. **Priority Mail, USPS Tracking Number: 9505 5126 7939 9273 2920 03**
- b. **Priority Mail, USPS Tracking Number: 9505 5126 7939 9273 2919 90**

Therefore, a search warrant to open the packages is requested.

Further, your Affiant sayeth naught.



Andrew W. Kremer
United States Postal Inspector

Subscribed and sworn to and before me this 2nd day of October, 2019



Stephanie K. Bowman
United States Magistrate Judge



ATTACHMENT A
PROPERTY TO BE SEARCHED

The property to be searched is the package associated with **Priority Mail, USPS Tracking**
Number: 9505 5126 7939 9273 2920 03, addressed to LEIGHA SAYRE, 5470 BEECHMONT
AVE APT.4, CINCINNATI, OHIO 45230 with a return address of Value+ Marketing, 4201 E
Cesar Chavez Ave, Los Angeles, CA 90063.



United States Postal Inspection Service
Pittsburgh Division

OFFICER AFFIDAVIT

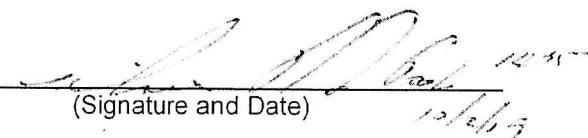
I, DEPUTY N. POOLE, AM, AND HAVE BEEN, EMPLOYED BY THE HAMILTON COUNTY SHERIFF'S OFFICE, SINCE 2004. AMONG OTHER DUTIES, I AM CURRENTLY THE ASSIGNED HANDLER OF NARCOTICS DETECTION CANINE "AKIM", WHICH IS TRAINED AND CERTIFIED IN THE DETECTION OF THE PRESENCE OR ODOR OF NARCOTICS DESCRIBED AS FOLLOWS:

Marijuana, Hashish, Cocaine, Heroin, Methamphetamines, Ecstasy

ON 10/2/2019, AT THE REQUEST OF POSTAL INSPECTOR A. KREMER I RESPONDED TO THE US POSTAL INSPECTION SERVICE CINCINNATI FIELD OFFICE WHERE "AKIM" DID ALERT TO AND INDICATE UPON THE FOLLOWING DESCRIBED ITEM:

USPS Priority Mail, USPS Tracking Number: 9505 5126 7939 9273 2920 03, addressed to LEIGHA SAYRE, 5470 BEECHMONT AVE APT.4, CINCINNATI, OHIO 45230, with a return address of Value+ Marketing, 4201 E Cesar Chavez Ave, Los Angeles, CA 90063.

BASED ON MY TRAINING AND EXPERIENCE AND THAT OF "AKIM", I CONSIDER THE ABOVE DESCRIBED ITEM TO CONTAIN WITHIN OR UPON THE PRESENCE OR ODOR OF A NARCOTIC OR OTHER DANGEROUS CONTROLLED SUBSTANCE.


(Signature and Date) 10/2/19